

TRINA A. HIGGINS, United States Attorney (#7349)
TODD C. BOUTON, Assistant United States Attorney (#17800)
JACOB J. STRAIN, Assistant United States Attorney (#12680)
SACHIKO JEPSON, Special Assistant United States Attorney (#17077)
Attorneys for the United States of America
111 South Main Street, Suite 1800 | Salt Lake City, Utah 84111
Telephone: (801) 524-5682

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

UNITED STATES OF AMERICA,	:	Case No. 2:23-cr-00010-HCN
	:	
Plaintiff,	:	JOINT MOTION FOR PROTECTIVE
	:	ORDER
v.	:	
	:	
PLASTIC SURGERY INSTITUTE OF	:	Judge: Howard C. Nielson, Jr.
UTAH, INC.; MICHAEL KIRK	:	Magistrate Judge: Jared C. Bennett
MOORE JR.; KARI DEE BURGOYNE;	:	
KRISTIN JACKSON ANDERSEN;	:	
AND SANDRA FLORES,	:	
	:	
Defendants.	:	

The parties to the above captioned case, hereby request the Court enter the following protective order in this case:

1. During the United States' investigation, it obtained records, including bank records, financial records, sensitive files, health records, and personal and financial records of others. These records contain personal identification and financial information including, among

other personal information, home addresses, Social Security numbers, bank account numbers, dates of birth, and other identifying data.

2. The United States intends to produce the above materials in discovery to the defense. All such materials are intended solely for the use of the defendants, their attorneys, or other individuals or entities acting within the attorney-client relationship to prepare for the trial in this case. The purpose of this protective order is to prevent the unauthorized dissemination, distribution, or use of such materials containing the personal information of others or gathered in connection with an on-going criminal investigation.

3. Defendants, their attorneys, and all other individuals or entities who receive materials in this case are prohibited from directly or indirectly providing access to, or otherwise disclosing the contents of, these materials to anyone not working on the defense of this criminal case, or otherwise making use of the materials in a manner unrelated to the defense of this criminal case. This prohibition on disclosure of the materials includes, but is not limited to, a prohibition on sharing the names of persons identified in the discovery with the public. Authorized use of materials related to the defense of this criminal case shall include, however, showing and discussing such materials with United States and defense witnesses.

4. Defendants, their attorneys, and all other individuals or entities who receive materials in this case shall maintain all materials received from the United States in a manner consistent with the terms of this protective order. Materials produced to the defense shall be stored in a secure manner by defense counsel in boxes, files, or folders marked "UNDER

PROTECTIVE ORDER - DO NOT DISCLOSE." Electronic materials produced to the defense and printouts obtained from electronic materials shall be handled in the same manner.

5. Defendants and their attorneys are required to give a copy of this protective order to all individuals or entities engaged or consulted by defense counsel in preparation of the trial in this case. A knowing and willful violation of this protective order by any of the defendants, their attorney(s), or others may result in contempt of court proceedings or other civil or criminal sanctions.

6. Within 90 days of the conclusion of this case, including all related appeals, all documents produced pursuant to this protective order, and all copies thereof (other than exhibits of the Court), shall be returned to the United States Attorney's Office. Alternatively, the defendant's attorney may inform the United States Attorney's Office in writing that all such copies have been destroyed.

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7. The provisions of this order governing disclosure and use of the documents shall not terminate at the conclusion of this criminal prosecution.

TRINA A. HIGGINS
United States Attorney



TODD C. BOUTON
Assistant United States Attorney

Wendy Lewis

KATHRYN N. NESTER
WENDY M. LEWIS
Nester Lewis PLLC
Attorneys for Defendants Plastic Surgery
Institute of Utah, Inc.; and Michael Kirk
Moore Jr.

Earl Xaiz

EARL G. XAIZ
Yengich & Xaiz
Attorneys for Defendant Kari Dee Burgoyne

Edward K. Brass (w/ permission)

EDWARD K. BRASS

Brass & Cordova

Attorney for Defendant Kristin Jackson
Andersen

Kris Angelos

KRISTIN R. ANGELOS

Federal Public Defender

Attorney for Defendant Sandra Flores